

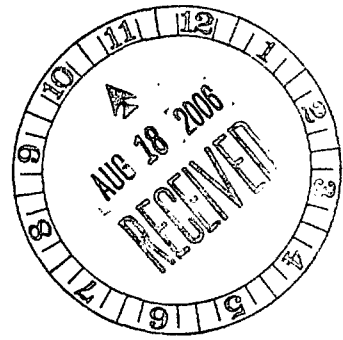
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CHARLES H. MONTANGE
ATTORNEY AT LAW
426 NW 162ND STREET
SEATTLE, WASHINGTON 98177
(206) 546-1936
FAX: (206) 546-3739



17 August 2006
by fax and express

Hon. Vernon Williams
Secretary
Surface Transportation Board
1925 K Street, N.W.
Washington, D.C. 20423-0001

Re: PYCO Industries -- Feeder Line Application --
South Plains Switching, Ltd., F.D. 34890

motion to reject Pioneer/KJRY August 16 filing
please distribute immediately

Dear Mr. Williams:

Although we have not yet been served, PYCO Industries, Inc. (PYCO) notes that the STB website indicates that Pioneer Railcorp d/b/a Keokuk Junction Railway Company has filed a pleading on August 16 which our colleague representing West Texas & Lubbock appears designed to remedy defects in Pioneer's otherwise defective feeder line application for "Alternative Two." When PYCO filed its initial feeder line application in F.D. 34844, the Director rejected it on two grounds, one of which was an inadequate showing as to financial responsibility, notwithstanding the fact that PYCO in its initial application indicated it was prepared to file further information under a confidentiality order. This Board in its July 3 decision in F.D. 34844 and F.D. 34890 upheld the Director and denied PYCO Industries an opportunity to amend its feeder line application with additional information bearing on financial responsibility.

What is good for the gander also works for the goose. If PYCO was not permitted to amend with additional information, then neither should Pioneer Railcorp. PYCO accordingly moves to reject the entirety of the Pioneer/KJRY filing.

PYCO also moves to reject the entirety of the Pioneer/KJRY filing for lack of proper service. This Board's regulations require service by the same class used on the Board. Where Pioneer uses hand delivery to the Board in an expedited proceeding, then it needs to employ either an email, a fax, or next day delivery service on PYCO's counsel, not service when

Washington, D.C. counsel gets around to it, or when the U.S. Postal Service gets one of its first class deliveries across the country to the undersigned or down to my co-counsel in the heart of Texas. If Pioneer/KJRY intends to participate, then it needs to employ express delivery and to stop prejudicing PYCO by trying to get the "local jump" on STB that some from the other Washington seem to attempt from time to time.

PYCO has not had time to review Pioneer's as yet unserved August 16 filing, and we reserve our rights to file comments upon it and to otherwise move as appropriate.

Respectfully submitted,


Charles H. Montange
for PYCO Industries, Inc.

cc. Messrs. McFarland (fax) (SAW)
Mullins (fax) (PI/KJRY)
Sippel (fax) (USRP)
Goldstein (fax) (ADM)
Heffner (fax) (WTL)